

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION**

SIGMA-ALDRICH CO. LLC,

Plaintiff,

v.

QUANTABIO LLC;  
QIAGEN BEVERLY LLC;  
QIAGEN GMBH; and  
DOES 1- 10,

Defendants

)  
)  
)  
)  
)  
)  
)  
)  
)  
)  
)  
)

Case No. \_\_\_\_\_

**PLAINTIFF’S MOTION FOR LEAVE TO FILE UNDER SEAL PLAINTIFF’S  
COMPLAINT AND ACCOMPANYING EXHIBITS**

Plaintiff Sigma-Aldrich LLC, pursuant to E.D.Mo. L.R. 13.05, moves the Court to enter its order sealing Plaintiff’s Complaint against Defendants herein, as well as the exhibits accompanying the Complaint, so as to lawfully keep such information confidential until further order of the Court or conclusion of this suit.

In support of this motion, Plaintiff states:

1. This action alleges breach of a commercial agreement (“Agreement”) on the part of Defendants, to the detriment of Plaintiff.
2. The allegations of the Complaint and contents of the Agreement contain commercially sensitive information, as set forth in greater detail in the Memorandum in Support of this motion, which is filed under seal.
3. Representatives of Defendants have been provided courtesy copies of this motion, the separately-filed Memorandum in Support, the Complaint, and the exhibits thereto, and requested to advise the Court within 7 days of the present filing per the referenced Local Rule whether Defendants oppose the requested sealing or, instead,

support it, in whole or in part. Defendants' position on these questions should assist in informing the Court's consideration of the instant motion.

4. The accompanying Memorandum in Support is incorporated by reference.

Wherefore, Plaintiff prays the Court to enter its Order sealing the Complaint and accompanying exhibits submitted by Plaintiff until further contrary order of the Court or conclusion of the lawsuit.

Respectfully Submitted,

Dated: January 24, 2022

**BRYAN CAVE LEIGHTON PAISNER LLP**

By: /s/ J. Bennett Clark

J. Bennett Clark – 30907MO  
One Metropolitan Square  
211 North Broadway, Suite 3600  
St. Louis, MO 63102 USA  
T: (314) 259-2000  
F: (314) 259-2020  
Email: [Ben.Clark@bclplaw.com](mailto:Ben.Clark@bclplaw.com)

K. Lee Marshall – 48653MO  
Ashley C. Bateman – 335198CA  
(pro hac vice to be requested)  
Three Embarcadero Center, 7th Floor  
San Francisco, CA 94111  
T: (415) 675-3400  
F: (415) 675-3434  
Email: [klmarshall@bclplaw.com](mailto:klmarshall@bclplaw.com)  
[ashley.bateman@bclplaw.com](mailto:ashley.bateman@bclplaw.com)

Attorneys for Plaintiff